

**DEPARTMENT OF TRANSPORTATION**

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December 5, 2002

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Cross Media Division

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Associate Director  
Water Division  
U. S. Environmental Protection Agency  
75 Hawthorne St.  
San Francisco, CA 94105-3901

Attn: Nancy Levin, Kathy Dadey

Dear Lisa Hanf and Nancy Woo,

Caltrans and the Federal Highway Administration (FHWA) respectfully request your concurrence on the Least Environmentally Damaging Practicable Alternative (LEDPA) for the State Route 65 Lincoln Bypass project. Caltrans and FHWA propose that the D 13 North Modified Alternative be presented as the LEDPA.

Caltrans met with Nancy Levin and Kathy Dadey on October 31, 2002 to discuss the request for concurrence sent on September 30, 2002. Also attending that meeting were Loren Clark with the Placer County Planning Department and Rod Campbell, Community Development Director for the City of Lincoln. It was a very productive meeting, with information shared and discussed on recent and anticipated growth and land-use patterns in the vicinity of the proposed Lincoln Bypass project. This letter and the attached information serve to address the growth inducement, agricultural land conversions, and community impact concerns raised by EPA at the October 31<sup>st</sup> meeting. For your convenience, the September 30<sup>th</sup> letter and notes from the October 31<sup>st</sup> meeting are also attached to this letter.

Caltrans, FHWA, the City of Lincoln and Placer County would all appreciate your prompt consideration of this supplemental information, and concurrence on the proposed LEDPA for this vital and much-needed transportation project. If you have any questions, please contact either myself at (916) 274-0588 or Karen McWilliams at (916) 274-0631. Thank you.

Sincerely,

John D. Webb, Chief North Region Environmental Services

c: RC Slovensky FHWA  
Tom Cavanaugh, Corps of Engineers  
Rod Campbell, City of Lincoln  
Loren Clark, Placer County  
bc Kome Ajise, Karen McWilliams, Chris Collison

Attachment: (Sept. 30<sup>th</sup> letter, meeting notes from October 31<sup>st</sup>.)

KMcWilliams/KM

## PLA-65 Lincoln Bypass Project – LEDPA Support Information

### Least Environmentally Damaging Practicable Alternative (LEDPA):

Caltrans and FHWA propose that the D 13 North Modified alternative is the LEDPA. As you can see on the table below, the impacts to vernal pools and wetlands are relatively comparable for all the alternatives.

**Table 1 Impacts to Key Resources**

	AAC2 Alternative	A5C1 Alternative	D1 Alternative	D13 Alternative	D13 South Modification Alternative	D13 North Modification Alternative
Jurisdictional Waters <sup>1</sup>	6.23 ha (15.4 acres)	7.85 ha (19.4 acres)	5.30 ha (13.1 acres)	4.73 ha (11.7 acres)	5.91 ha (14.6 acres)	5.50 ha (13.6 acres)
Vernal Pools and Swales	3.80 ha (9.4 acres)	4.65 ha (11.5 acres)	2.43 ha (6.0 acres)	2.14 ha (5.3 acres)	3.28 ha (8.1 acres)	2.23 ha (5.5 acres)
Riparian and Oak Habitats	11.21 ha (27.7 acres)	8.17 ha (20.2 acres)	1.54 ha (3.8 acres)	4.45 ha (11.0 acres)	1.17 ha (2.9 acres)	4.45 ha (11.0 acres)
Socioeconomic	469 residences	461 residences	20 residences	10 residences	10 residences	18 residences

<sup>1</sup> Includes areas meeting Corps criteria as wetlands and non-wetland waters of the U.S.

However, this table does not show the quality of vernal pools impacted by each alternative. The A5C1 and AAC2 alternatives impact higher quality vernal pools than the D alternatives. The AC alternative would go through the Foskett Ranch area and impact resources currently being protected in two environmental preserves. (See Figure 3)

In addition, the AC alternatives have a much greater community impact than the D alternatives. During the ten years between concurrence on the “range of alternatives” and the present, growth in Lincoln has continued. Several developments have been approved or are already built within the AC alignment. A recent count of residences affected by the project shows that the A5C1 alternative impacts 461 residents and the AAC2 alternative impacts 469 residents. The AC alternatives would split established communities as well as recently constructed communities such as the Foskett Ranch and run adjacent to a proposed elementary school, separating it from the communities it would serve on the other side of the highway. (See Figure 2) The additional costs of purchasing right of way and relocation efforts would cause the project costs to escalate at least \$16,000,000.

Community impacts are often hard to gauge due to the lack of analytical information. There are no standards or formulas that can be used to compute short and long-term impacts when an alternative divides a community and determining significance is often subjective. The CEQA guidelines provide some direction on determining whether a project impact is significant:

Will the project:

- Disrupt or adversely affect a property of cultural significance to a community or ethnic social group,
- Induce substantial growth or concentration of population,
- Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system,
- Displace a large number of people,
- Disrupt or divide the physical arrangement of an established community;
- Conflict with established recreational, educational, religious or scientific uses of the area,

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- Convert prime agricultural land to nonagricultural use or impair the agricultural productivity of prime agricultural land, or
- Interfere with emergency response plans or emergency evacuation plans.

In determining impacts to community cohesion and effects on property values, certain characteristics may provide insight as to whether or not a significant effect will occur. For example, a community is considered cohesive if it is determined that the residents have a "sense of belonging", whether they have a level of commitment to the residents of the community and neighbors, groups and institutions. Significant impact need not be determined by the length of time a community has been in existence but may be determined by the level of shared activities, ethnic group clusters and personal contact in addition to other social factors. Comments received during open houses from the public in the existing community along the AC alternative have voiced a passion towards their choice in moving to a smaller, more rural community that allows for a more intimate atmosphere among neighbors. The communities that would be impacted by the AC alternative belong to neighborhood watch programs. A neighborhood watch program is an example of a group that is committed to a community and demonstrates cohesiveness.

An alternative that would separate the community, pose safety problems, place a barrier to mobility between neighborhoods and increase noise to the level that would require soundwalls, may have an impact to the "intimate" feel that has attracted these residents to Lincoln.

Long-term effects on property values can occur when a transportation project cuts through existing communities. Many factors are considered when determining the extent of the impact on property values of a freeway or major highway such as the character of the neighborhood, supply and demand of homes, community services and other socioeconomic factors. Generally, properties abutting freeways do not appreciate in price and in some cases are priced 0.5% to 16% lower than properties further removed from the freeways. A decrease in property values will in turn affect the local tax base as well.

Although an exact determination cannot be made on the long-term impacts of the property values, it can be reasonably stated that since the AC alternatives divide existing communities, this may pose long-term socioeconomic impacts, which would change the dynamics of the existing community and could lead to a decrease in desirability of the neighborhoods. Therefore, the AC alternative could indeed pose a significant effect under CEQA and NEPA.

In contrast, the D 13 North Modified alternative would not divide any existing communities. Although the D 13 North Modified alternative would result in impacts to other resources, as would the AC alternative, the overall impacts to resources and socioeconomic factors would be less damaging.

Growth in the Sacramento Valley continues to occur. It is Caltrans mission to improve mobility across California. While Caltrans does not have the authority to control or regulate growth, it does, by the nature of providing improved access to farther reaches of the county, influence growth to a certain degree. To this end, Caltrans is actively working with the cities, counties and regional agencies across the state to ensure that well planned transportation solutions are provided to address the needs of pedestrians, bicyclists, transit and carpoolers, motor vehicles and goods movement with the least impacts to our environment and communities.

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Caltrans is working with the City of Lincoln and Placer County to compliment their existing resource conservation strategy with the mitigation required for this project. As a result of this coordination, the Aitkens Ranch mitigation proposal was developed. The Aitkens Ranch is a pivotal piece in Placer Legacy's plan for resource conservation in the lower Sacramento Valley. Improvements on this property are already underway; consequently, by the time construction begins on the Lincoln Bypass, mitigation will already be in place.

## **Growth-inducing impacts:**

Population in Placer County is currently 237,000 and is projected to grow to 415,335 by the year 2025. While the majority of growth has occurred in the cities of Roseville and Rocklin, Lincoln has recently had significant increases in population and housing. However, there are still large tracts of rural residential and agricultural lands in the western portion of the County. In 1998, the State Department of Finance identified Placer as one of two fastest growing counties in the State of California with a four percent annual growth rate. Population and employment projections predict Placer County's population will more than double in the next 40 years. This increase will undoubtedly have an impact on the conversion of existing open space into urban and rural residential developments. The County and Cities' of Lincoln, Roseville and Rocklin are accommodating this growth in their general plan updates and are taking steps to protect and preserve resources and agricultural lands to ensure that the county's quality of life remains intact.

The current population in the City of Lincoln is 13,000 and is estimated to increase to 57,875 by the year 2025. (<http://www.sacog.org/demographics/proj2001/pdf/cities/plac.pdf>) This population growth has increased development pressure in Placer County and the City of Lincoln. Despite this pressure, the City of Lincoln has retained the growth boundaries established 20 years ago. In October 1998, the Public Facilities Element of the City's General Plan was amended to include provisions to maintain wildlife habitat, encourage wildlife preservation areas in and around the City and establish a "no net loss" of wetlands strategy in conjunction with the Clean Water Act of 1972.

In order to effectively manage growth the City of Lincoln is currently updating its General Plan to reflect both the City and County's growth management strategies, which include conservation easements, urban growth limits, open space designations and agricultural zoning. (See Figure 2) The proposed highway improvement is consistent with these strategies.

## **Placer Legacy:**

The concern over development pressure that will be occurring over the next 20 years and the possibility of losing city and county natural resources spawned the creation of Placer Legacy. Placer Legacy was established using three working groups to provide input from a variety of stakeholders. These groups consisted of a Citizens Advisory Committee, an Interagency Working Group and a Scientific Working Group. Placer Legacy has identified county trends, resource conflicts and stressors and possible strategies to address growth pressures. Strategies currently being pursued are land acquisitions and easements, agency coordination, education and incentives. Placer Legacy is actively pursuing approximately 1,300 acres of conservation easements West and North of the planned Lincoln Bypass to limit growth-inducing impacts (see Figure 1).

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Placer Legacy is also coordinating with agencies such as the National Resource Conservation Service through their wetland reserve program, the Placer Land Trust, the American Farmland Trust and the California Rangeland Trust to identify landowners interested in selling agricultural easements. In addition, Placer Legacy has been in contact with the Central Valley Habitat Joint Venture Project; responsible for the North American Waterfowl Management Plan, the Auburn Ravine/Coon Creek Coordinated Resource Management Plan (CRMP) and other creek restoration projects.

Currently, Placer Legacy is working on Placer County's Habitat Conservation Plan (HCP) and a Natural Communities Conservation Plan (NCCP) expected to be completed in 2004. This Plan will be implemented in phases. The first phase is to gather information on vernal pools/grasslands, valley riparian habitats and salmon habitat in the areas within Western Placer County such as Lincoln. Phase 2 will be to collect information in the Foothills and the East Side Sierra Nevada and the third phase will focus on the West and East Side Sierra Nevada. Once resources have been identified, the HCP/NCCP will be prepared with guidance from various stakeholders such as the scientific community, land development interests, the environmental community and agricultural interests. A scientific working group will continually provide advice and assistance to ensure that the program incorporates sound principles of conservation ecology. These plans will establish a conservation strategy to ensure that resources are protected from development. In addition, financial mechanisms will be analyzed to determine how to implement these plans. The City of Lincoln is currently a member of Placer Legacy and will be participating in programs that will provide for conservation of prime agricultural lands in addition to conservation easements within their jurisdiction.

## **Agricultural Land:**

Placer County has compiled a GIS database of Williamson Act contracts. (See Figure 1. Because of lag time with data input, the attached Williamson Act map does not reflect recently expired contracts.) County data indicate that the majority of these parcels were placed under contract between 1967-1980. Participation in the program decreased by 17% during the following decade and decreased by 4% between 1991 and 2000. The drop in renewals was largely offset by the amount of new enrollments into the program during the latest 10-year period, but the amount of acreage enrolled vs. number of parcels has decreased significantly (Western Placer Agricultural Study, January 2002). Much of the non-renewed contracts are for pastureland or "native" vegetation.

The area outside the City of Lincoln's "sphere of influence" is currently zoned by Placer County as Agriculture at a density of one dwelling unit per 80 acres and abuts lands that are designated for 4-6 dwelling units per acre by using a buffer or transition area. Although, zoning often can be changed, there is a strong impetus to restrain the growth in Western Placer County to within the city limits.

Another aspect that will help keep agricultural lands in the Williamson Act is the ability of Placer County Water Agency and the Nevada Irrigation District to provide a stable source of long-term water supply to commercial agriculture customers in the Western & Northern portion of Placer County. Increases in urbanization will increase demand for water and policies on water sources may have to be re-evaluated to ensure that agriculture production has adequate water supply in the future. In order to provide incentive for farmers to remain under the Williamson Act, Placer County is actively

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pursuing agricultural easements along with conservation easements as part of the HCP/NCCP. The Farmland Security Zones under the Williamson Act enables agricultural landowners to enter into contracts with the County for 20-year increments with an additional 35 percent tax benefit over and above the standard Williamson Act contract. This may provide even further incentive offsetting any acreage that may be removed from the program in the future.